

May 28, 2019

Greg Mattson, Project Manager
Planning & Development Services Department
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: **CITY OF SAN DIEGO COMMENTS ON THE RECIRCULATED DRAFT REVISED ENVIRONMENTAL IMPACT REPORT FOR THE OTAY RANCH RESORT VILLAGE – VILLAGE 13 PROJECT (GPA04-003, REZ04-009, TM-5361, SP04- 002, ER LOG04-19-005, and SCH NO. 2004101058)**

Dear Mr. Mattson:

RA-1-1

The City of San Diego (City) Planning Department has received the recirculated Draft Revised Environmental Impact Report (EIR) prepared by the County of San Diego (County) and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft Revised EIR and appreciates this opportunity to provide comments to the County. The City looks forward to continued coordination with the County and other local, regional, state, and federal agencies. In response to this request for public comments, the City has the following comments on the Draft Revised EIR for your consideration.

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TRANSPORTATION & STORM WATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE PLANNER – MGStephens@sandiego.gov, 858-541-4361

RA-1-2

1. **Chapter 4.0 Project Alternatives (Page 4.0-2, first paragraph, last sentence).** The description of supplemental technical analyses includes analyses for drainage and storm water management to support review of Alternative H and denotes respective appendices involved (which are Appendix D-13 Drainage Study for Alternative H and Appendix D-14 Preliminary Storm Water Management Plan for Alternative H). The remainder of the alternatives analysis narrative only considers storm water from the perspective of storm water basins in Alternative H potentially increasing human exposure to health vectors (although Table 4.0-3 Summary of Significant Effects and Mitigation Measures for Alternative H does include mitigation relating to drainage and storm water management). Hydrology and water quality topics are not otherwise explicitly considered in the Chapter 4.0 alternatives analysis provided.

PLANNING DEPARTMENT – KRISTEN FORBURGER, SENIOR PLANNER –
KForburger@sanidiego.gov, 619-236-6583

MHPA Boundary Line Adjustment

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| RA-1-3 | <p>1. The City of San Diego confirms a MHPA Boundary Line Adjustment is required upon submittal of the Site Development Permit (SDP) for widening of Otay Lakes Road.</p> |
| RA-1-4 | <p>2. M-BI-2 States “Replacement of MHPA lands within Cornerstone Lands is proposed to be at a 1:1 ratio for lands replaced inside the MSCP Preserve. For replacement lands that are located outside of the MSCP Preserve, the mitigation is at a 4:1 ratio.”</p> <p>The City has previously required a 2:1 ratio for replacement of Cornerstone Lands and does not have regulation requiring a 4:1 ratio for lands outside the MSCP Preserve. Pursuant to the City’s Biology Guidelines (2018) impacts within the City of San Diego must be mitigated within the City of San Diego’s jurisdiction.</p> <p>Ratios would be determined pursuant to the City’s Biology Guidelines as the time of SDP submittal and processing.</p> |

MHPA Land Use Adjacency Guidelines

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| RA-1-5 | <p>1. Due to the adjacency of the development to the MHPA and Cornerstone Lands, the development will need to conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the City’s MSCP Subarea Plan. In particular, lighting, drainage, landscaping, grading, access, and noise must not adversely affect the MHPA. Please address the City’s MHPA Land Use Adjacency Guidelines in the project’s biology report and draft environmental document and discuss how these issues are being addressed.</p> |
| RA-1-6 | <ul style="list-style-type: none">• Lighting <p>Lighting should be directed away from the MHPA, and shielded if necessary. Please see San Diego Municipal Code §142.0740 for further information if needed.</p> |
| RA-1-7 | <ul style="list-style-type: none">• Drainage <p>Drainage should be directed away from the MHPA, or if not possible, must not drain directly into the MHPA. Instead, runoff should flow into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA.</p> |
| RA-1-8 | <ul style="list-style-type: none">• Toxics <p>Land uses, such as recreation and agriculture that use chemicals or generate by-products such as manure that are potentially toxic or that may impact wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts.</p> |
| RA-1-9 | <ul style="list-style-type: none">• Landscaping <p>No invasive plant species shall be planted in or adjacent to the MHPA/Cornerstone Lands. Please provide the landscape plan for review.</p> |

- RA-1-10
- **Grading**
- All manufactured slopes must be included within the development footprint and outside the MHPA/Cornerstone Lands.
- RA-1-11
- **Brush Management**
- All Zone 1 brush management areas must be included within the development footprint and outside the MHPA/Cornerstone Lands. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation.
- RA-1-12
- **Access**
- Access to the MHPA/Cornerstone Lands, should be directed to minimize impacts and to reduce impacts associated with domestic pet predation.
- RA-1-13
- **Noise**
- Due to the site's location adjacent/within the MHPA, construction noise will need to be avoided, if possible, during the breeding season of the *California gnatcatcher* (3/1-8/15), *least Bell's vireo* (3/15-9/15), *southwestern willow flycatcher* (5/1-8/30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys will be required in order to determine species presence/absence. If the species *is/are* not identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and should include temporary noise walls/berms.
- If a survey is not conducted and construction is proposed during the species' breeding season, presence would be assumed and a temporary wall/berm would be required. Noise levels from construction activities during the bird breeding season should not exceed 60 dBA hourly LEQ at the edge of the occupied MHPA, or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ.

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- RA-1-14
- Thank you for the opportunity to provide comments on the Draft Revised EIR. Please contact me directly if there are any questions regarding the contents of this letter or if the County would like to meet with City staff to discuss our comments. We understand that the County will also accept additional comments after the May 28, 2019 review period ends and prepare responses accordingly. The City may submit additional comments. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at RMalone@sanidiego.gov or by phone at 619-446-5371.

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Mr. Greg Mattson
May 28, 2019

Sincerely,

A handwritten signature in blue ink, appearing to read "Heidi Vonblum".

Heidi Vonblum, Program Manager
Planning Department

RM/ep

cc: Reviewing Departments (via email)
 Review and Comment online file